



April 13, 2022

Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

By Electronic Filing.

Re: In re: New York City Policing During Summer 2020 Demonstrations,  
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases

Dear Judge Gorenstein:

I write on behalf of Plaintiffs in the consolidated cases, to confirm the parties have now settled my and Mr. Rickner's entitlement to fees as a sanction for Defendants' violation of the unambiguous orders at Dkt. Nos. 365 and 352, as ordered by the Court on February 11.

*First*, after negotiation, the parties have settled the fee entitlement at \$7,000.00 — \$3,250.00 to me and \$3,750.00 to Mr. Rickner — with the understanding that at Defendants' request, we removed certain time Defendants believed was not included in the sanctions order, and will not be barred from seeking compensation for those hours later.

Consistent with that, we believe the Court should enter a final sanction order against Defendants for these two violations, specifying the amount of the sanctions as set out above (e.g., something like “\$7,000.00 in attorneys fees for violation of the Court’s orders at Dkt. Nos. 365 and 352”).

*Second*, despite following up several times, we still have not received payment — or any indication when we can expect Defendants to fulfill the sanction. We confirmed the final agreement after significant efforts (and weeks of follow up with little response, and no substantive response, from Defendants) on March 22. Since then, we have followed up asking for updates and received no response whatsoever.<sup>1</sup> Therefore, we ask the Court to order Defendants complete payment within 30 days of this letter.

Once again, we thank the Court for its continued time and attention.

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<sup>1</sup> We sent an earlier draft of this letter to Defendants in the afternoon on April 11, informing them that if we received no response, we would be filing it and asking the Court to set a deadline for payment. More than 24 hours have passed without any response, so, consistent with Dkt. No. 317, we have filed this motion.



Respectfully submitted,  
/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN&GREEN P.L.L.C.**

*Attorneys for Some Plaintiffs, on behalf of all Plaintiffs*

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cc:

All relevant parties by electronic filing.

COHEN & GREEN

Page 2 of 2